

Exhibit B

May 11, 2021 E. Vandevelde Letter

GIBSON DUNN

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May 11, 2021

VIA ELECTRONIC MAIL

John Polito, Esq.
Morgan Lewis & Bockius LLP
One Market, Spear Street Tower
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Re: *Oracle USA, Inc., et al. v. Rimini Street, Inc., et al.*
No. 2:10-cv-00106-LRH-VCF (D. Nev.)

Dear John:

We write to provide you with further information concerning our investigation into the Salesforce issue we notified you of on May 3, 2021. As previously described, on Friday, April 30, we discovered a potential issue with respect to Rimini's export of Salesforce data during the discovery period following the final judgment and conclusion of *Rimini I*. See May 3, 2021 Email from E. Vandevelde. We immediately began investigating the matter and, although we did not have full information, the next business day (Monday, May 3) we notified you of the issue and our belief that an error in the process had, in fact, occurred and that not all responsive data had been properly exported and produced. *Id.* We continued our investigation and also immediately began working with Rimini to collect responsive Salesforce material in order to provide it to Oracle as quickly as possible.

The potential issue was discovered on April 30 when Gibson Dunn lawyers were working on a filing required by the Court's March 31, 2021 order and could not locate certain Salesforce cases expected to be in the previously produced data. Based on our investigation to date, we believe an incorrect query of the Salesforce database was used to export Salesforce materials. Rimini produced to Oracle certain tables and accompanying Salesforce data, including more than 42,900 documents, that were collected using this query. See Oct. 22, 2019 Ltr. from J. Tryck re Production 28; RSI007485199–RSI007664646; Jan. 10, 2020 Ltr. from J. Tryck re Production 40; RSI007954583, RSI007954669–RSI007954678.

The Salesforce production was supposed to include cases open between November 5, 2018 (the date of the injunction) and the date of the export, for the PeopleSoft and J.D. Edwards product lines. See Aug. 6, 2019 Email from J. Tryck. However, our investigation since April 30 has revealed that the Salesforce production was under-inclusive in some respects (*i.e.*, it omitted certain responsive cases) and over-inclusive in others (*e.g.*, it included cases pertaining

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to product lines other than PeopleSoft and J.D. Edwards). The replacement production corrects this issue, and includes Salesforce data for all cases for the PeopleSoft and J.D. Edwards product lines that were open at any time between November 5, 2018 (the date of the injunction) and September 10, 2019 (the date of the prior Salesforce export).

Rimini regrets the error and is willing to work with Oracle on any adjustments to the case schedule that it may necessitate. We propose to meet and confer with you on that subject once you have had time to conduct a preliminary analysis of these records.

Thank you.

Very truly yours,



Eric D. Vandeveld

EDV/jt